

# **EXHIBIT 1**

**(Email from Toyota's counsel with unilateral offer to extend  
due date for expert reports and trial by 60 days)**

**CAUSE NUMBER: 3:11-cv-0207-N**

**From:** David Stone [<mailto:David.Stone@bowmanandbrooke.com>]  
**Sent:** Friday, September 13, 2013 9:59 AM  
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**Cc:** Kurt C. Kern; Jude T. Hickland; Brian E. Mason  
**Subject:** Greene

Counsel, as I understand it, your primary objection to the dates we have provided for the TMS witnesses (September 20 and October 4 or October 4 and 5) is your concern about your expert disclosure deadline. In an effort of address those concerns, please be advised that we are willing to stipulate to an order extending all pretrial deadlines and the trial setting by 60 days. So doing would give your experts more than enough time to consider the depositions in advance of providing their reports.

Please let me know your position on this proposal.

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